

OA 91 Criminal Complaint

## United States District Court

NORTHERN

DISTRICT OF

CALIFORNIA

2012 JUN 19 P 1:24

UNITED STATES OF AMERICA  
V.MANUEL SANCHEZ,  
A/K/A MANUEL GUZMAN LARA,  
A/K/A ERNESTO VEGA,  
A/K/A JESUS BRAVO VEGA

CRIMINAL COMPLAINT

12-70704  
Case Number

HRL

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state that the following is true and correct to the best of my knowledge and belief. On or about October 27, 2006 in Monterey County, in the Northern District of California defendant(s) did,

(Track Statutory Language of Offense)

False Statement in Application for a U.S. Passport

in violation of Title 18 United States Code, Section(s) 1542

- a. Maximum prison sentence - 10 years
- b. Maximum fine - \$250,000
- c. Maximum supervised release term - 3 Years
- d. Mandatory special assessment - \$100

I further state that I am a(n) Special Agent of the Diplomatic Security Service and that this complaint is based on the following facts:

Continued on the attached sheet and made a part hereof:

Continued ☒ Yes ☐ No

Approved

As To MEREDITH J. EDWARDS (SAUSA)Form: AUSA

Name/Signature of Complainant

Sworn to before me and subscribed in my presence,

Date

6/18/12

at San Jose, CA

City and State

Howard R. Lloyd, U.S. MAGISTRATE JUDGE

Name &amp; Title of Judicial Officer

Signature of Judicial Officer

NORTHERN DISTRICT OF CALIFORNIA

) NORTHERN DISTRICT OF CALIFORNIA

) AFFIDAVIT

Santa Clara County

) Santa Clara County

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT CHARGING  
MANUEL SANCHEZ, A/K/A MANUEL GUZMAN LARA, A/K/A ERNESTO VEGA,  
A/K/A JESUS BRAVO VEGA, WITH VIOLATING 18 U.S.C. § 1542:  
FALSE STATEMENT IN APPLICATION FOR A U.S. PASSPORT**

I, as a duly sworn federal law enforcement officer, hereby depose and state as follows:

1. I am a Special Agent employed by the Diplomatic Security Service (DSS), which is an agency of the United States Department of State. DSS Special Agents are empowered under Title 22 U.S.C. § 2709 to investigate passport fraud.

2. I have a bachelor's degree from the University of Washington and am a graduate of the Federal Law Enforcement Training Center's Criminal Investigator Training Program. I have been employed by DSS since 10/24/2010, and have received, and receive on an ongoing basis, training in the laws, rules and regulations concerning passports, visas, and citizenship documents.

3. This affidavit establishes probable cause to arrest MANUEL SANCHEZ, A/K/A MANUEL GUZMAN LARA, A/K/A ERNESTO VEGA, A/K/A JESUS BRAVO VEGA (hereafter referred to as "Guzman Lara"), for making a false statement in an application for a U.S. passport, in violation of 18 U.S.C. § 1542. It is alleged that he applied for a U.S. passport using the false name of JESUS BRAVO VEGA. This affidavit does not contain every fact, piece of information or evidence concerning this alleged violation.

**Passports in General**

4. The Passport Act of 1926, as amended, was in full force and effect throughout the period of this investigation. This Act, codified in 22 U.S.C. § 211a, authorized the United States Secretary of State to grant and issue United States passports under rules prescribed by the President and/or other federal laws. Some of these rules are that a person wanting a United States passport must complete and submit an application to the State Department and must submit proof of American citizenship, usually a birth certificate and proof of identity, usually a driver's license, with their application. Another rule allows officers at United States Post Offices and City Clerk Offices to accept passport applications, and to then forward them to the State Department for processing.

**Facts Supporting Probable Cause**

5. On October 27, 2006, an individual identifying himself as Jesus Bravo VEGA (Guzman Lara) applied for a U.S. passport via a DS-11 form (application #058897767) in the Northern District of California, at the United States Post Office in Salinas, CA. Applicant presented as citizenship evidence a U.S. birth certificate #112-78-6036868, registered on 9/22/78, in the name Jesus Vega with DOB 9/17/1978, and presented as identification California Driver's License DL #B7442286 in the name Jesus Bravo Vega.

6. On September 22, 2011, one Jesus Vega, Jr. applied for a U.S. passport via a DS-11 (application #324485859) at the United States Post Office in Dehli, CA. This applicant submitted a California Driver's License, which contained a thumb print. This thumb print was sent to the Department of Homeland Security, which returned a match for FBI # 382603JC6. FBI #382603JC6 matches the photo and history of Jesus Vega, Jr.

7. On September 28, 2011, the Charleston Post Office, using a standard fraud prevention measure, determined that the identity associated with application #324485859 had been used on a prior application, application #058897767. A review of the two applications was conducted and while both applications used the same social security number, the same date of birth, and the same parent names, the photographs submitted with the applications did not match, nor did the Driver's Licenses. The case was then referred to the DSS, San Francisco Field Office for investigation.

8. On October 20, 2011, Investigative Assistant ("IA"), Michael Acevedo sent the thumb print associated with California Driver's License #B7442286 (the California Driver's License that Guzman Lara presented for identification when he submitted the DS-11 on October 27, 2006) to the FBI. The FBI concluded that the thumb print submitted belonged to **MANUEL SANCHEZ, FBI #733 376 AB5**.

9. IA Acevedo then ran FBI #733 376 AB5 in the TECS database to review Guzman Lara's arrest record. According to Guzman Lara's record, he was arrested in 2003 on charges of False Claim to U.S. Citizenship (18 U.S.C. § 911). The report showed he has used several names in the past, including MANUEL SANCHEZ, A/K/A MANUEL GUZMAN LARA, A/K/A JESUS BRAVO VEGA. The report also showed Guzman Lara had an Alien Registration Number of A96189832.

10. On November 1, 2011, IA Acevedo sent to the Forensic Document Laboratory at ICE Homeland Security Investigations, the FBI number, Alien number, and possible aliases of the Applicant. The United States Citizen and Immigration Services (USCIS) database returned the name Manuel "**GUZMAN LARA**," with a date of birth of 5 September 1977, born in Mexico. The photographs accompanying the

fingerprints provided by ICE IDENT match the passport application #058897767, from 2006, and the driver's license used on that date, #B7442286. In short, assumed the identity of the true Jesus Vega, Jr., and obtained a California driver's license and a birth certificate in the name of the true Jesus Vega, Jr., which included Jesus Vega, Jr.'s date of birth and other biographical information. While the California driver's license Guzman Lara obtained is in the name of Jesus Vega, Jr., the photograph on the license is a photograph of Guzman Lara.

11. Subsequently, Special Agent Scott Wickland searched the e-mail address listed on Applicant's 2006 passport application, ervega03@hotmail.com. SA Wickland found a Facebook profile under the name of Ernesto VEGA using that e-mail address. The photo on the Facebook profile of Ernesto Vega matches all of the photographs that were used in the passport application (#058897767) and the driver's license used on that date (#B7442286). Although the alias Ernesto Vega does not appear in any other law enforcement database, I believe Guzman Lara is currently using the alias Ernesto Vega.

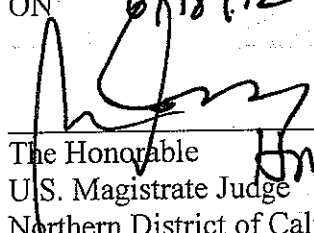
### Conclusion

12. Based on the fingerprint and photo analysis of both individuals, as well as the other facts and information detailed in this affidavit, I believe probable cause exists that MANUEL SANCHEZ, A/K/A MANUEL GUZMAN LARA, A/K/A ERNESTO VEGA, A/K/A JESUS BRAVO VEGA, knowingly and willingly made a false statement in an application for a U.S. passport when he applied in the name of Jesus Bravo Vega, in violation of 18 U.S.C. § 1542. MANUEL SANCHEZ, A/K/A MANUEL GUZMAN LARA, A/K/A ERNESTO VEGA, A/K/A JESUS BRAVO VEGA, knew at the time that he was applying in a false name, and that the U.S. birth certificate and California ID card that he supplied in support of this application were not legally issued to him. As such, I respectfully request a warrant for his arrest.



Matthew Deakin  
Special Agent  
Diplomatic Security Service  
San Francisco Field Office

SUBSCRIBED AND SWORN BEFORE ME  
ON 6/18/12



The Honorable  
U.S. Magistrate Judge  
Northern District of California